



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

03-OSR-0041

Mr. R. F. Naventi, Project Manager
Bechtel National, Inc.
2435 Stevens Center
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – REVIEW OF THE HANFORD TANK WASTE
TREATMENT AND IMMOBILIZATION PLANT NONRADIOLOGICAL WORKER SAFETY
AND HEALTH PLAN (THE PLAN)

Reference: BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Hanford Tank Waste
Treatment and Immobilization Plant Nonradiological Worker Safety and Health Plan
Revision," CCN 048810, dated January 2, 2003.

The U. S. Department of Energy, Office of River Protection (ORP) has completed its preliminary review of the Plan transmitted by Bechtel National, Inc. (BNI) in the Reference. ORP reviewed the changed and unchanged portions of the Plan to gain clarification between BNI written requirements and the current and conforming site practices and controls.

The ORP has a number of questions and requests for clarification (see the Enclosure) that must be resolved before approval of the Plan. The ORP intends to promptly review your responses, when received, to complete the review.

If you have any questions, please contact me, or your staff may call Robert C. Barr, Office of Environmental Safety and Quality, (509) 376-7851.

Sincerely,

Roy J. Schepens
Manager

ESQ:JBG

Enclosure

cc w/encl:
T. Meagher, BNI

**Review of 24590-WTP-PL-IS-01-001, Rev. 1,
Nonradiological Worker Safety and Health Plan
Questions and Clarifications**

1. Section 1.2 - Purpose of the Nonradiological Safety and Health Plan, first paragraph, refers only to activities at the Waste Treatment and Immobilization Plant (WTP) site. Bechtel National, Inc. (BNI) has activities outside of the WTP site, such as the staging area on Stevens Drive. Does this Plan only apply to the WTP site or does it apply to all BNI activities?

Please clarify.

2. Section 1.2 - Purpose of the Nonradiological Safety and Health Plan, second paragraph, refers to the contract requirements of RL/REG-2000-04, *Industrial Health and Safety Oversight Plan*. RL/REG-2000-04 has been revised as ORP M440.1-2, "Industrial Health and Safety Oversight Plan for the Waste Treatment Plant Contractor," which is now the correct contractual reference.

Please correct the contractual reference.

3. Section 1.2 - fifth paragraph, changed concurrence to the Safety Assurance Manager.

Please clarify how the name change of the organization could change the conduct of safety and health oversight over the construction and cold start-up activities.

4. Section 2.3 - Safety Assurance Management, refers to the consolidation of services within the Safety Assurance organization, which will reduce the time and cost involved in providing them or accessing offsite services.

Please clarify the changes to safety and health oversight resulting from the consolidation.

5. Section 2.3.4 - Security, first paragraph specifies all individuals entering the site will sign in and out. Present site practice, with the exception of the mining operations, is electronic badging rather than signing.

Please clarify the requirement for signing in and out.

6. Section 3.6 - Request for Waiver or Deviations, refers to project Safety Assurance plans in the first sentence.

Please clarify whether the Safety Assurance plans are job requirements or not.

7. Section 3.8 - Procurement Control, refers to notification of the Safety Assurance department.

Please clarify the Safety Assurance role in reviewing and analyzing procurements.

8. Section 4.3 - Safety Task Analysis Risk Reduction Talk (STARRT), requires the work crew to sign the STARRT card. Present site practice, at all job sites, is for the general foreman and the superintendent to sign all STARRT cards for every job. This management feedback mechanism was not mentioned in this revision.

Please clarify the management role regarding STARRT cards.

9. Section 4.11 - Lockout/ Tagout Program, refers to 29 CFR 1910.147. This is a new requirement with this revision of the Plan. 29 CFR 1910.147 (a)(iii)(A) states “This standard does not cover the following: Construction, agriculture and maritime employment.”

Please indicate how this change will be applied to construction activities.

10. Section 6.3 - Equipment and Tool Inspection Program; third paragraph, specifies that defective un-repairable tools be immediately removed from the site after tagging and segregation. Existing and conforming field practice is to tag, segregate and secure those tools until timely removal is accomplished.

Please clarify.

11. Section 6.4 - DOE Inspection and Investigation. The second paragraph indicates that the Safety Assurance Manager or a Safety Assurance representative will usually accompany the DOE inspectors. Based upon existing practice, the DOE inspector is usually accompanied by Contractor supervisors, other than the Safety Assurance representative. In those cases, where the inspector is not accompanied by Safety Assurance personnel, the DOE inspectors attempt to brief the safety manger during site visit.

Please resolve the discrepancy between the existing practice and the language within the Plan.

12. Section 8.6 - Noise Control & Hearing Conservation, references 29 CFR 1910.95 as the site criteria. This is a new requirement with this revision of the Plan. 29 CFR 1926 applies to construction activities. Section 8.6 adds another requirement from general industry to the BNI construction activities.

Please indicate how this change will be applied to construction activities.

13. Section 9 - Project Procedures, first paragraph, states the WTP shall follow 29 CFR 1926 and ORP M440.1-2. Elsewhere this revised Plan specifies following 29 CFR 1910. Further, RL/REG-2000-04 should be replaced by ORP M 440.1-2.

Please provide necessary changes.

14. Section 9 - second paragraph, refers to the use of desktop guides to perform work. Do the desktop guides provide work practice elements that are considered job safety requirements?

Please clarify.

15. Section 10 - References, under codes and standards, RL/REG-2000-04 should be replaced by ORP M 440.1-2. The reference criteria for lockout and tagout is DOE-RL-SOD-INST-L&T.001, "Hanford Site Lockout/Tagout Program", rather than 29 CFR 1910.147 as stated in section 4.11 of the Plan.

Please examine the list of references and list those that apply to this revision.